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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)
(Jointly Administered)

**REPLY IN RESPONSE TO SECURITIES
LEAD PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' REVISED
PROPOSED ORDER APPROVING THE
SECURITIES CLAIM PROCEDURES**

Related Docket No.: 8964, 9931, 9982

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized
2 debtors (collectively, the “**Debtors**” or “**Reorganized Debtors**,” as applicable) in the above-
3 captioned chapter 11 cases (the “**Chapter 11 Cases**”), submit this Reply in response to the revisions
4 (the “**Proposed Revisions**”) proposed by Public Employees Retirement Association of New Mexico
5 (“**PERA**”) in *Securities Lead Plaintiff’s Objection to Reorganized Debtors’ Revised Proposed Order*
6 *Approving the Securities Claims Procedures* [Dkt. No. 9982] (the “**Objection**”).

7 Pursuant to the Court’s docket order dated January 18, 2021, the Reorganized Debtors and
8 PERA have met and conferred on the Proposed Revisions, and the parties have reached agreement
9 on revisions to the proposed order that resolve all of the matters raised in the Objection.

10 Attached hereto as **Exhibit 1** is a revised proposed order granting the Motion (including all
11 exhibits and annexes thereto, the “**Revised Proposed Order**”), which includes the Securities Claims
12 Information Procedures as **Exhibit A-1**, the Trading Information Request Form as **Annex 1**, the
13 Securities ADR Procedures as **Exhibit A-2**, the Abbreviated Mediation Notice as **Annex 2**, the
14 Standard Mediation Notice as **Annex 3**, and the Securities Omnibus Objection Procedures as **Exhibit**
15 **A-3**. The Revised Proposed Order reflects the changes to which the Reorganized Debtors and PERA
16 have agreed to resolve the issues raised in the Objection, and also reflects the changes noted in the
17 Court’s docket order.

18 Attached hereto as **Exhibit 2** is a redline comparison of the Revised Proposed Order against
19 the revised proposed order filed on January 4, 2021 in the *Notice of Submission of Revised Proposed*
20 *Order Approving Securities Claims Procedures* [Dkt. No. 9931].

21 Attached hereto as **Exhibit 3** is a chart showing the parties’ agreed resolutions to PERA’s
22 Proposed Revisions.

1 Dated: January 25, 2021

2 **WEIL, GOTSHAL & MANGES LLP**

3 **KELLER BENVENUTTI KIM LLP**

4 By: /s/ Richard W. Slack

5 Richard W. Slack

6 *Attorneys for the Debtors and*
7 *Reorganized Debtors*